

# **Exhibit 6**

## **May 24, 2023 CSAM Discovery Hearing Transcript Excerpt**

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ALABAMA  
WESTERN DIVISION

JANE JOE #1, 7:21-CV-220-LSC  
Plaintiff, May 24, 2023  
vs. Tuscaloosa, Alabama  
MG FREESITES, LTD, ET AL., 10:00 a.m.  
Defendant.

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REPORTER'S OFFICIAL TRANSCRIPT OF  
STATUS HEARING

BEFORE THE HONORABLE L. SCOTT COOGLER  
UNITED STATES CHIEF DISTRICT JUDGE

Proceedings recorded by OFFICIAL COURT REPORTER, Qualified  
pursuant to 28 U.S.C. 753(a) & Guide to Judiciary Policies  
and Procedures Vol. VI, Chapter III, D.2. Transcript  
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A P P E A R A N C E S

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FOR THE PLAINTIFF:

Gregory Zarzaur  
Joshua Patrick Hayes  
Danielle M. Bianculli Pinter  
Kelsie Marie Overton  
Kevin Kent

FOR THE DEFENDANT:

Kathleen Massey  
Michelle Yeary  
Lindsay Pickell Lounsbury  
William Somerville, III

State of Alabama Attorney General's Office:

Clark Morris  
Edmund LaCour

National Center Missing and Exploited Children

Justin Little

Court Reporter: Teresa Roberson, RMR

1 whatever, and could -- and I know Mr. Little is just getting  
2 into this, but I would assume NCMEC and the National Computer  
3 Center that's in Virginia, I think it's Virginia, that  
4 constantly searches these hash values for child pornography,  
5 would be able to identify if that is a known image. But it  
6 would also be useful to make sure that that image is secured  
7 where we know what image actually came off that sheet, if that  
8 becomes a question down the road. Protecting the defendants  
9 who say that is not a minor, for instance, and the plaintiffs  
10 saying maybe it is. Then why -- if you're not getting the  
11 hash value, is there -- have you -- I mean, am I wrong or am I  
12 right? Does anybody know?

13 MS. MASSEY: You're talking -- Mr. Zarzaur was  
14 talking about embedded images in a document like an email.  
15 When we're talking about hash values associated with content  
16 or images, that's the video or the photo itself.

17 And absolutely, Your Honor, there are databases of  
18 known CSAM and Mindgeek, like other responsible platforms, run  
19 content against those databases as part of the review before  
20 the content goes public. So we do certainly have that for the  
21 images.

22 THE COURT: Okay. Let me ask our investigator from  
23 the Attorney General's office that's right there.

24 It's my understanding that if there is an image,  
25 just say a picture, that that picture has a hash value, does

1 it not?

2 INVESTIGATOR: That is correct, Your Honor.

3 THE COURT: And you could be able to see that hash  
4 value whether it's in a known database of child pornography or  
5 not, just like a picture of me that's out there, if it's --  
6 every single frame has its own hash value; is that correct?

7 INVESTIGATOR: Every individual file would have its  
8 own hash value, Your Honor. As long as the file itself is not  
9 modified in any way, the hash value would remain the same.  
10 However, if you add it to a document or to another file, it  
11 would dramatically change the hash value for that image.

12 THE COURT: And then how would they get the hash  
13 value once they add it to, like, embedded in a document?

14 INVESTIGATOR: You can sometimes remove the image  
15 from the document and make it a separate file and the hash  
16 value would return as a match. However, once you insert it  
17 into a document and the process of exporting, if you add even  
18 one bit of data to that image, it will automatically change  
19 the hash value yet again.

20 THE COURT: And there would be another hash value  
21 that would replace the original one at that point?

22 INVESTIGATOR: That is correct.

23 THE COURT: My concern is, just like, guys, I raised  
24 this a long time ago with y'all, this is something that I deal  
25 with, unfortunately, in my line of work and we see, and I